

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

RMAIL LIMITED,

Plaintiff,

v.

AMAZON.COM, INC.,  
PAYPAL, and SOCIETY FOR WORLDWIDE  
INTERBANK FINANCIAL  
TELECOMMUNICATION SCRL D/B/A  
SWIFT,

Defendants.

CASE NO. 2:10-CV-258-JRG  
LEAD CASE

RPOST HOLDINGS, INC., RPOST  
INTERNATIONAL LIMITED, and RMAIL  
LIMITED,

Plaintiffs,

v.

READNOTIFY.COM PTY LTD., CHRIS  
DRAKE, and SILICON VALLEY WEB  
HOSTING, INC.,

Defendants.

CASE NO. 2:11-cv-16-JRG

RPOST HOLDINGS, INC., RPOST  
INTERNATIONAL LIMITED, and RMAIL  
LIMITED,

Plaintiffs,

v.

ZIX CORPORATION,  
Defendants.

CASE NO. 2:11-cv-64-JRG

RMAIL LIMITED, RPOST  
COMMUNICATIONS LIMITED, and RPOST  
HOLDINGS, INC.,

Plaintiffs,

v.

DOCUSIGN, INC.,

Defendant.

CASE NO. 2:11-cv-299-JRG-RSP

RMAIL LIMITED, RPOST  
COMMUNICATIONS LIMITED, and RPOST  
HOLDINGS, INC.,

Plaintiffs,

v.

RIGHT SIGNATURE, LLC, FARMERS  
GROUP, INC., and FARMERS INSURANCE  
COMPANY, INC.,

Defendants.

CASE NO. 2:11-cv-300-JRG-RSP

RPOST HOLDINGS, INC., RPOST  
COMMUNICATIONS LIMITED, and RMAIL  
LIMITED,

Plaintiffs,

v.

ADOBE SYSTEMS INCORPORATED and  
ECHOSIGN, INC.

Defendants.

CASE NO. 2:11-cv-325-JRG-RSP

**JOINT MOTION FOR PAGE LIMITS FOR CLAIM CONSTRUCTION BRIEFING**

The parties to the above-titled actions hereby file this Joint Motion for Page Limits for Claim Construction Briefing. The patents involved in this case are U.S. Patent No. 6,182,219 B1 and C1 (collectively, “the ’219 Patent”); and U.S. Patent No. 6,571,334 C1 (“the ’334 Patent”) (collectively, “the Feldbau patents”). Also involved are U.S. Patent No. 7,707,624 (“the ’624 Patent”); U.S. Patent No. 7,865,557 B2 (“the ’557 Patent”); and U.S. Patent No. 7,966,372 (“the ’372 Patent”) (collectively, “the Tomkow patents”). As noted in the parties Joint Claim Construction Statement (Dkt. No. 211), rather than filing individual briefs, the parties in the member cases have jointly agreed to consolidate much of their briefing, in a way that will minimize the number of pages submitted to the Court while providing each party with the opportunity to be heard. In this case, unlike the typical consolidated case, the defendants in each of the different cases face varying numbers and groups of patents-at-issue. In some cases, just a single patent in one patent family is asserted; in other cases, multiple patents from multiple families are asserted. In addition, different groupings of plaintiffs are involved in the different cases. Consequently, the parties on both sides have worked together to arrive at a briefing structure that balances the needs of different defendants to address the issues at stake in their particular cases, and provides the plaintiffs adequate space to address the issues overall. The parties respectfully request that the Court therefore enter the following claim construction briefing page limitations in the consolidated actions captioned above:

- a. Plaintiffs will file an Opening brief not to exceed thirty (45) pages on claim construction issues in the Feldbau patents (the ’219 and ’334 Patents);
- b. Plaintiffs will file a brief not to exceed thirty (30) pages on claim construction issues in the Tomkow patents (the ’624, ’557, and ’372 Patents);
- c. Defendants will file a brief not to exceed forty-five (45) pages on claim construction

issues in the Feldbau patents (the '219 and '334 Patents);

- d. Defendants will file a brief not to exceed thirty (30) pages on claim construction issues in the Tomkow patents (the '624, '557, and '372 Patents);
- e. Any Defendant may file a Supplemental Response Brief of not more than five (5) pages;
- f. Plaintiffs will file a Reply brief not to exceed fifteen (15) pages on claim construction issues in the Feldbau patents (the '219 and '334 Patents); and
- g. Plaintiffs will file a Reply brief not to exceed fifteen (15) pages on claim construction issues in the Tomkow patents (the '624, '557, and '372 Patents);

The parties to the above-titled actions respectfully request that the Court grant this Joint Motion for Page Extension for Claim Construction Briefing. Attached is a proposed Order for the Court's use.

Dated: December 20, 2012

Respectfully submitted,

/s/ Robert P. Greenspoon  
Robert P. Greenspoon (*admitted pro hac vice*)  
[rpg@fg-law.com](mailto:rpg@fg-law.com)  
FLACHSBART & GREENSPOON, LLC  
333 N. Michigan Ave., 27th Floor  
Chicago, IL 60601  
Tel: 312-551-9500  
Fax: 312-551-9501

Kenneth C. Goolsby  
Texas Bar No. 24003668  
[casey.goolsby@boonlaw.com](mailto:casey.goolsby@boonlaw.com)  
BOON, SHAVER, ECHOLS,  
COLEMAN & GOOLSBY, PLLC  
1800 NW Loop 281, Suite 310  
Longview, TX 75604  
Tel: 903-759-2200

/s/ James E. Geringer  
James E. Geringer (OR Bar No. 951783)  
[james.geringer@klarquist.com](mailto:james.geringer@klarquist.com)  
Salumeh R. Loesch (OR Bar No. 090074)  
[salumeh.loesch@klarquist.com](mailto:salumeh.loesch@klarquist.com)  
John D. Vandenberg (OR Bar No. 893755)  
[john.vandenberg@klarquist.com](mailto:john.vandenberg@klarquist.com)  
KLARQUIST SPARKMAN, LLP  
121 S.W. Salmon Street, Suite 1600  
Portland, Oregon 97204  
Telephone: (503) 595-5300  
Facsimile: (503) 595-5301

Jennifer Parker Ainsworth  
Texas Bar No. 00784720  
[jainsworth@wilsonlawfirm.com](mailto:jainsworth@wilsonlawfirm.com)  
WILSON, ROBERTSON & CORNELIUS, P.C.

Fax: 903-759-3306

*Attorneys for Plaintiff, RMail Limited*

One American Center  
909 ESE Loop 323, Suite 400  
P.O. Box 7339 [75711]  
Tyler, Texas 75701  
Telephone: (903) 509-5000  
Facsimile: (903) 509-5092

*Attorneys for Defendants Amazon.com,  
Inc. and PayPal, Inc.*

*Attorneys for Plaintiffs, RPost Holdings, Inc.  
RPost International Limited, and RMail  
Limited in 2:11-cv-6, 2:11-cv-16, 2:11-cv-64*

*Attorneys for Defendant,  
Readnotify.com Pty Ltd.*

*Attorneys for Plaintiffs, RPost Holdings, Inc.  
RPost Communications Limited, and RMail  
Limited in 2:11-cv-299, 2:11-cv-300, 2:11-cv-  
325*

/s/ Lewis E. Hudnell, III

Winston O. Huff,  
State Bar No. 24068745  
Navarro Huff PLLC  
302 N. Market, Suite 450  
Dallas, Texas 75202  
214.749.1220 (Firm)  
214.749.1223 (Fax)  
[whuff@navarrohuff.com](mailto:whuff@navarrohuff.com)

Lewis E. Hudnell, III  
Colvin Hudnell LLP  
375 Park Avenue Suite 2607  
New York, New York 10152  
Tel: 347.855.4772  
Fax: 347.772.3034  
[lewis@colvinhudnell.com](mailto:lewis@colvinhudnell.com)

/s/ J. Pat Heptig

J. Pat Heptig  
[pheptig@heptiglaw.com](mailto:pheptig@heptiglaw.com)  
Heptig Law Group, Ltd.  
1700 Pacific Ave., Suite 2650  
Dallas, Texas 75201  
Tel: 214-451-2154

*Defendant Chris Drake for Himself, pro se*

/s/ Christopher Drake

Mr. Christopher Drake  
[christopher@pobox.com](mailto:christopher@pobox.com)  
8 Masthead Quay  
Noosaville, QLD 4566  
AUSTRALIA

*Attorneys for Defendant  
Zix Corporation*

/s/ David M. Barkan

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Melissa Richards Smith  
Gillam & Smith, LLP  
303 South Washington Avenue  
Marshall, Texas 75670  
Tel: 903-934-8450  
Fax: 903-934-9257  
[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

OF COUNSEL:  
David M Barkan  
Fish & Richardson - Redwood City  
500 Arguello St  
Suite 500  
Redwood City, CA 94063  
Tel: 650-839-5070  
Fax: 650-839-5071  
[barkan@fr.com](mailto:barkan@fr.com)

Roger A Denning  
Scott A. Penner  
Fish & Richardson - San Diego  
12390 El Camino Real  
San Diego, CA 92130  
Tel: 858-678-5070  
Fax: 858-678-5099  
[denning@fr.com](mailto:denning@fr.com)

*Attorneys for Defendant Docusign, Inc.*

*/s/ David A. Lowe*

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David A. Lowe, Esq.  
Lowe Graham Jones PLLC  
701 Fifth Avenue, Suite 4800  
Seattle, Washington 98104  
T: 206.381.3300  
F: 206.381.3301  
Email: [lowe@lowegrahamjones.com](mailto:lowe@lowegrahamjones.com)

Jose C. Villarreal, Esq.  
Wilson Sonsini Goodrich & Rosati PC  
900 South Capital of Texas Highway  
Las Cimas IV, Fifth Floor  
Austin, Texas 78746  
T: 512.338.5400  
F: 512.338.5499  
Email: [jvillarreal@wsrg.com](mailto:jvillarreal@wsrg.com)

*Attorneys for Defendant Right Signature, LLC,  
/s/ Arnold S. Weintraub*

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Arnold S. Weintraub  
The Weintraub Group, P.L.C.  
28580 Orchard Lake Road, Ste. 140  
Farmington Hills, Michigan 48334  
T: 248-865-9430  
F: 248-856-9436  
[aweintraub@weintraubgroup.com](mailto:aweintraub@weintraubgroup.com)

*Attorneys for Defendants Farmers Insurance  
Company, Inc. and Farmers Group, Inc.*

*/s/ David D. Bahler*

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David D. Bahler (State Bar No. 01513100)  
Fulbright & Jaworski LLP  
98 San Jacinto Boulevard, Ste. 1100  
Austin, Texas 78701  
T: 512-536-3005  
F: 512-536-4598  
[dbahler@fulbright.com](mailto:dbahler@fulbright.com)

*Attorneys for Adobe Systems Incorporated and  
Echosign, Inc.*

*/s/ Andrew P. Valentine*

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Andrew P. Valentine  
DLA PIPER LLP (US)  
2000 University Avenue  
East Palo Alto, California 94303  
t: 650.833.2000  
f: 650.833.2001  
[andrew.valentine@dlapiper.com](mailto:andrew.valentine@dlapiper.com)

**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with all counsel and unrepresented parties of record regarding this Joint Motion and all have indicated to me that they have no opposition.

/s/ Lewis E. Hudnell, III

Lewis E. Hudnell, III

**CERTIFICATE OF SERVICE**

The undersigned certifies that counsel and unrepresented parties of record who are deemed to have consented to electronic service are being served with a copy of this Joint Motion for Page Extension for Claim Construction Briefing, via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 20th day of December, 2012.

/s/ Lewis E. Hudnell, III

Lewis E. Hudnell, III